

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 1:13-CR-00315-KMW**

**FREDERIC CILINS,**

**Defendant.**

/

**DEFENDANT CILINS' MOTION TO BRING CELLULAR PHONE AND LAPTOP  
INTO COURTHOUSE FOR USE DURING HEARING**

Comes now, the Defendant, Frederic Cilins, by and through undersigned counsel, and hereby requests that this Honorable Court approve undersigned to bring a laptop and a cellular telephone into the courthouse for use during the hearing in this case June 20, 2013, and in support thereof states as follows:

1. Mr. Cilins is currently charged with Intimidation or Force Against Witness; Obstruction of Criminal Investigations; and Destruction, Alteration or Falsification of Records in Federal Investigations.
2. Mr. Cilins' has a hearing on his motion to reduce bond scheduled for June 20, 2013, at 10:30a.m. in front of Judge Kimba M. Wood.
3. Undersigned respectfully requests that she be permitted to bring a laptop and cellular telephone into the courthouse for possible use during the hearing.
4. Undersigned has conferred with Assistant United States Attorney Elisha Kobre. He does not oppose this motion or the relief requested herein.

WHEREFORE, Defendant, Frederic Cilins, respectfully requests that this Honorable Court approve the request to bring a laptop and cellular telephone into the courthouse.

Respectfully submitted,

/s/ Michelle P. Smith  
Michelle P. Smith  
Law Office of Michelle P Smith, P.A.  
Florida Bar No. 389382  
827 Menendez Court  
P.O. Box 1788  
Orlando, Florida 32802-1788  
Telephone: 407-601-6700  
Facsimile: 888-614-3231  
E-mail: michellepsmith\_law@yahoo.com  
michellepsmith@gmail.com  
michellesmith@mpsmithlegal.com

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 11, 2013, undersigned electronically filed the foregoing *Defendant Cilins' Motion to Bring Cellular Phone and Laptop into Courthouse for Use During Hearing* with the Clerk of Court (CM/ECF) by using the CM/ECF system which will send a notice of electronic filing and copy to the following: Elisha Kobre, Stephen Spiegelhalter, Bruce Lehr, and Sherleen Mendez.

/s/ Michelle P. Smith  
Co-counsel for Frederic Cilins